

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: BRUCE R. AND GWENDOLYN B. MCCRORY

CASE NO: 15-50372-KMS

DEBTORS

CHAPTER 13

MOTION TO APPROVE SALE OF ASSET

COME NOW the Debtor(s) BRUCE R. AND GWENDOLYN B. MCCRORY (hereinafter "Debtors") and file this their Motion to Approve Sale of Asset and in support thereof would respectfully show unto the Court the following to-wit:

1. The Debtors now seek Court approval for the sale of their 2002 Pro Sport Boat, VIN# WJIW0010J102. *See* Schedule B (Dkt.# 4).

2. The Debtors estimated on their Schedule B a value of \$16,000.00 for said asset and have agreed with a buyer to a sale price of \$14,000.00.

3. The said asset was un-encumbered at the time of filing and titled to the Debtors personally.

4. The Debtors have been compelled to seek Court approval for the sale of the above asset out of the need to reinvest sale proceeds into M&W Auto Sales for inventory. Said reinvestment of sale proceeds has become necessary to ensure funding of the Debtors' proposed Chapter 13 Plan.

WHEREFORE, PREMISES CONSIDERED, the Debtors respectfully request this Court's approval of the sale of the aforementioned asset as described herein. The Debtors further request any other relief, either general or specific, in which they may be entitled in the premises.

Respectfully Submitted,

**BRUCE R. MCCRORY and
GWENDOLYN B. MCCRORY**

By: /s/ James G. McGee, Jr.
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COUNSEL FOR DEBTOR(S)

CERTIFICATE OF SERVICE

I, James G. McGee, Jr., counsel for the Plaintiff, do hereby certify that I have this date filed the above and foregoing via CM/ECF filing system which will then send a true and correct copy of the above to all creditors listed in the attached Creditor Matrix and to the following:

United States Trustee
USTPRegion05.JA.ECF@usdoj.gov

Warren A. Cuntz T1, Jr.
wacuntzcourt@cableone.net

Synchrony Bank c/o Recovery Management Systems Corporation
claims@recoverycorp.com

So Certified, this the 23rd day of April, 2015.

/s/ James G. McGee, Jr.
James G. McGee, Jr.